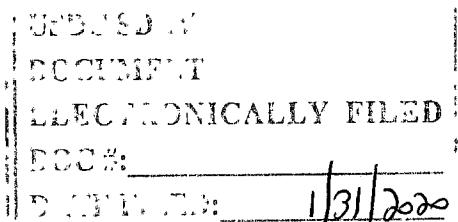


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January 30, 2020

The Honorable Colleen McMahon
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Connolly, et al.*, No. 16 Crim. 0370

Dear Chief Judge McMahon:

On behalf of Defendant Matthew Connolly in the above-captioned matter, we respectfully request permission for Mr. Connolly to travel to Florida from February 21 through March 1, 2020.

We have raised this travel request with Probation and the government. Because Mr. Connolly was granted release pending appeal by this Court, Probation has determined that it will not monitor Mr. Connolly while his appeal is pending. As a result, Probation is not taking a position regarding this travel request and defers to this Court. The government's position regarding this travel request is, "If [P]robation does not object, the government does not object."

We understand that Mr. Connolly's conditions of release were unchanged following this Court's stay of his sentence pending appeal. Those conditions permit him to travel to the Southern District of New York, the Eastern District of New York, New Jersey and Pennsylvania. Mr. Connolly requests permission to travel outside of this geographical limitation for a family trip to Key West, Florida on Friday, February 21, 2020. Mr. Connolly would travel by plane and stay overnight for nine nights at The Perry Hotel, located at 7001 Shrimp Road, Key West, Florida 33040. Mr. Connolly would return on Sunday, March 1, 2020.

Mr. Connolly has been fully compliant with the conditions of his release, including several previously-authorized trips. Mr. Connolly recorded a notarized Affidavit of Confession of Judgment securing his Appearance Bond of \$500,000 against his home in Somerset County, New Jersey. He does not pose a flight risk.

Thank you for your consideration.

Sincerely,

/s/ Phara A. Guberman

Phara A. Guberman
of PAUL HASTINGS LLP

cc: Counsel for the Department of Justice (via ECF)
Supervising Officer Enid Febus, Probation (via Email)